



December 12, 2014  
Environmental Management Support, Inc.  
Attn: Ms. Edie Findeis Cromwell  
8601 Georgia Avenue, Suite 500  
Silver Spring, MD 20910  
Phone: (301) 589-5318

**Re: U.S. EPA Brownfield Hazardous Substances and Petroleum Assessment Grant Proposal  
Jackson County, Jackson County, Michigan – RFP No. OSWER-OBLR-14-07**

Dear Ms. Cromwell:

The Jackson County (County) appreciates the opportunity to submit this proposal for a \$200,000 Brownfield Hazardous Substances, Community-Wide Assessment Grant and \$200,000 Brownfield Petroleum, Community-Wide Assessment Grant.

Jackson County is 722 square miles in size located in south-central Michigan between Chicago, Illinois and Detroit, Michigan. The County consists of one city, the City of Jackson, 19 townships and seven villages. Jackson County's economy has been heavily dependent on the industrial community since the mid-1800s. Older industrial factories in our target community no longer meet the needs of modern day manufacturers and the result is numerous properties that have been left vacant and unused.

We have identified six of these former industrial properties, "Priority sites", all with significant redevelopment potential based on their size, location, and other factors. Local businesses have expressed serious interest in acquiring each site for business expansion. However, blighted conditions and serious potential public health exposures at these sites deter actual development. In order for these sites to become viable in the marketplace, advance assessment and cleanup planning work will be needed. The absence of responsible parties and State resources means this need falls to the local community. With this Assessment Grant we intend to begin the process of detailed evaluation of these sites, developing conceptual plans for a safe and effective redevelopment, and better understanding of actual public health risks from these threatening sites. Through redevelopment, we believe we will improve the local neighborhoods by eliminating hazards and blighted conditions, providing new jobs and investment to the Community. We also intend to support additional redevelopment projects at smaller, less complex sites. We are pledging significant local resources to make this success possible – but the need is great. The support from U.S. EPA is vital to protecting our citizens and tackling these large, complex sites.

The County has demonstrated success and competence in managing economic redevelopment grants throughout the County. We are experienced in Brownfield Redevelopment and have an established team of technical and economic development professionals capable of implementing this grant fully and effectively. This grant will provide an important resource for us to continue to confront the most significant and looming challenges posed by brownfields in our community. Thank you for your time in consideration of our grant request. If you have any questions or require additional information, please do not hesitate to contact us.

Respectfully submitted,

A handwritten signature in black ink, reading "Michael Overton".

Michael Overton  
County Administrator/Controller

**Applicant Information:**

<b>a. Applicant Name:</b>	Jackson County	<b>ii. Chief Executive Officer:</b>	Michael Overton County Administrator
<b>Applicant Address:</b>	One Jackson Square, Suite 1100		120 W. Michigan Avenue
	Jackson, MI 49201		Jackson, MI 49201
<b>b. Applicant DUNS Number:</b>	08-8328-877	<b>Phone:</b>	(517) 768-6624
<b>c. Funding Requested:</b>		<b>Fax:</b>	(517) 788-4601
<b>i. Grant Type:</b>	Assessment Grant	<b>Email:</b>	moverton@co.jackson.mi.us
<b>ii. Amount</b>	\$400,000	<b>g. Date Submitted:</b>	December 17, 2014
<b>iii. Contamination</b>	Hazardous Substances (\$200,000) and Petroleum (\$200,000)	<b>h. Project Period:</b>	Three years
<b>iv.</b>	Community-wide	<b>i. Population:</b>	Jackson County – 160,309 (U.S. Census, 2013 Estimate)
<b>d. Proposed Location:</b>	Jackson County, Michigan	<b>j. "Special Considerations" checklist</b>	Attached
<b>e. Not Applicable</b>			
<b>f. i. Project Director:</b>	Amy L. Torres		
	Executive Director – Enterprise Group of Jackson, Inc.		
	One Jackson Square Suite 1100 Jackson, MI 49201		
<b>Phone:</b>	(517) 788-4458		
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## NARRATIVE PROPOSAL

### 1. Community Need

#### 1.a Targeted Community and Brownfields

##### 1.a.i Targeted Community Description

Jackson County is 722 square miles in size located in south-central Michigan between Chicago and Detroit. The County consists of one city, the City of Jackson, 19 townships and seven villages. Jackson County's economy has been heavily dependent on industry since the mid-1800s. In the early 1900s, the County was home to many automobile manufacturers, none of which remain. Industry was clustered on the northern perimeter of the City of Jackson and the areas immediately surrounding the City limits, and used the power of the Grand River for power, cooling water, and waste disposal. Across the County, old manufacturing operations and mills are located along the river banks, often accompanied by large amounts of fill material that allowed these structures to be constructed on the floodplain. In recent years, Jackson County suffered a number of economic setbacks, with many major manufacturers leaving and abandoning their antiquated facilities. They often deteriorate and attract criminal activity and vandalism. Indeed, one of Jackson County's Priority Sites is occupied by a burned-out pile of rubble resulting from arson of a 100-year old manufacturing plant (*Former Sparton Corp. site*).

We have identified several large, complicated sites that need assistance in Blackman Charter Township. This portion of the Township is the **targeted community – generally described as Census Tracts 55 and 59**. Blackman Township, and specifically these two census tracts, have a higher concentration of known impacted sites compared to other sections of the County. This is in large part due to the Township's manufacturing history. We have also identified a high priority site within the City of Jackson. These sites are relatively large parcels which were once fully functional manufacturing sites and are now vacant and/or underutilized.

Priority Area/Site	Local Unit of Government	Acreage	Census Tract
Jackson County	Jackson County		NA
Michigan Industrial Holdings	Blackman Twp.	20.3	Census Tract 59
Former Sparton Corp	Blackman Twp.	7	Census Tract 59
Former Plastigage	Blackman Twp.	14	Census Tract 55
Former Harvard Industries	Blackman Twp.	20	Census Tract 55
Former Acme Industries	City of Jackson	5	Census Tract 2

##### 1.a.ii Demographic Information

	Census Tract 55	Census Tract 59	Census Tract 2	Jackson County	Michigan	National
Population	5,099 <sup>1</sup>	2,815 <sup>1</sup>	2,913 <sup>1</sup>	160,248 <sup>6</sup>	9,883,640 <sup>3</sup>	308,745,538 <sup>1</sup>
Unemployment	5.4% <sup>1</sup>	6.2% <sup>1</sup>	11.9% <sup>1</sup>	7.4% <sup>2</sup>	7.2% <sup>5</sup>	6.7% <sup>2</sup>
Poverty Rate	11.8% <sup>1</sup>	26.7% <sup>1</sup>	39.9% <sup>1</sup>	12.9% <sup>1</sup>	16.3% <sup>2</sup>	11.8% <sup>3</sup>
Percent Minority	14.5% <sup>1</sup>	14.7% <sup>1</sup>	32.17% <sup>1</sup>	12.00% <sup>1</sup>	21.1% <sup>6</sup>	26.7% <sup>1</sup>
Median Household Income	\$38,030 <sup>3</sup>	\$27,482 <sup>1</sup>	\$27,500 <sup>3</sup>	\$46,615 <sup>6</sup>	\$48,471 <sup>1</sup>	\$ 51,371 <sup>3</sup>

<sup>1</sup>Data is from the 2010 U.S. Census data and is available at [www.census.gov/](http://www.census.gov/) <sup>2</sup>Data is from the Bureau of Labor Statistics and is available at [www.bls.gov/](http://www.bls.gov/) <sup>3</sup>Data is from the 2010 American Community Survey and is available at [http://www.census.gov/newsroom/releases/archives/income\\_wealth/cb11-157.html](http://www.census.gov/newsroom/releases/archives/income_wealth/cb11-157.html) <sup>4</sup>U.S. Census Bureau 2011 Estimates

<sup>5</sup>Michigan Department of Budget and Technology ([milmi.org](http://milmi.org)); <sup>6</sup>[www.usa.com](http://www.usa.com);

Demographic data shows that these three areas are challenged by various economic factors. Census Tract 55 would be classified as a "working class neighborhood," and while residents are more likely to be employed relative to the County average, they make considerably less per household (\$38,030) than

the average County citizen (\$46,615). Census Tracts 2 and 59 represent some of the poorest areas in the County and are classified as Low Income Level neighborhoods (source: HUD). Poverty rates are higher in these two areas than the County, State or National averages. Further, these households earn significantly less, with median household incomes far below County, State, and National averages. Census Tract 2 is also more ethnically diverse, with nearly one-third the population being a minority. The minority populations in Tracts 2 and 59 are primarily African-American, followed by Hispanic (source: American Community Survey). In Tract 55, a significant minority population is of Asian descent. The demographic data shows that the target community is more socio-economically challenged than other portions of the county, and brownfield redevelopment projects in these areas would help address these disparities.

### 1.a.iii Brownfields

Our target community was historically the center of manufacturing in urban Jackson County. These areas were at the outer edges of the City of Jackson, where factories were constructed during and after World War II. Working class neighborhoods sprang up, providing walkable access to jobs. Many of these 50- to 70-year-old manufacturing sites are now functionally obsolete. Buildings are often a hodgepodge of additions, lacking the ceiling height and free-span construction desired by modern industrial operations. Thus, the former industrial properties and the target community have been the victim of disinvestment as newer industrial developments have located in industrial parks far from the City center.

The *Michigan Industrial Holdings Site* (MIHI) and the *former Sparton Corp site* in Census Tract 59 are adjacent former manufacturing sites. A mobile home park and an old working class neighborhood with a low-income population are immediately adjacent. The MIHI site is a vacant parcel but previous studies indicated the presence of non-aqueous phase liquid petroleum which inhibits development. The former Sparton site contains a large and dangerous pile of debris from a March, 2011 fire that destroyed the onsite buildings. These sites are not secured and neighbors, children, and homeless people have relatively free access, inadvertently becoming exposed to the chemical and physical hazards, including asbestos, lead and chlorinated solvents, increasing their risk of lead poisoning, asthma, lung diseases, and cancers. We are aware of a homeless population occupying the MIHI site.

The Plastigage and Harvard Industries sites are large former manufacturing complexes located in Census Tract 55, also a medium to low income working class neighborhood. The Plastigage site originally made brake pads and later was a plastic extrusion company. Contamination from phthalates and other industrial contaminants have been found on site. Additionally, the buildings were demolished and a significant amount of debris remains unsecured. The Harvard Industries site has significant impacts from trichloroethylene and petroleum contaminants, hampering a new owner's development plans to re-use the building and spur new development on other portions of the property.

The former Acme Industries site in Census Tract 2 is one of the oldest manufacturing sites in the City of Jackson, originally producing farm implements and wagons. Later it was used by a company that manufactured heating and cooling equipment. Site investigations have found carbon tetrachloride, chlorinated solvents, and heavy metals. The site is now a fenced vacant lot in the midst of a growing arts-based neighborhood development project.

Priority Site	Known or Suspected Contaminants	Health Effects
Former Plastigage	Cis and trans 1,2-dichloroethylene, tetrachloroethylene, phenanthrene, phthalates, arsenic, asbestos	Liver, kidney and central nervous system disease, increased cancer risk, asthma sensitivity, headaches, skin rash and irritation, lung irritation, nausea, decreased white and red blood cell production, mesothelioma
Former Harvard Industries	Chlorinated solvents, petroleum	
Former Sparton Corp	Metals, solvents, petroleum, semi-volatile organic compounds, asbestos	
Former Acme Industries	Carbon tetrachloride, chlorinated solvents, heavy metals	
Michigan Industrial Holdings	Petroleum, metals, free-phase petroleum	

\*from Agency for Toxic Substances and Disease Registry Toxicological Profiles

In addition to the priority sites we have inventoried, a number of vacant properties or underused sites exist where new development would aid in neighborhood transformation. These include former automotive dealerships, defunct gas stations, small machine shops, a former drive-in movie theatre, etc. These are typically located in established commercial corridors on main thoroughfares in the area (W. and E. Michigan Ave., Ganson St). As such, their presence inhibits investment. Many of these sites are not known to have assessment data and their mere age and vacancy often creates the perception of environmental liability and cost. Assessments will better inform the public and developers about the actual risks.

Additionally, the Michigan Department of Environmental Quality (MDEQ) has identified and placed on its list of hazardous substance contaminated sites 96 locations within Jackson County. Fifteen of these are in Census Tract 55, five are in Census Tract 59 and 17 are in Census Tract 2 – about a third of all sites being in the target community. 168 open leaking underground storage tank (LUST) petroleum-contaminated sites (19 in Census Tract 55, nine in Census Tract 59, and 17 in Census Tract 2) and 181 closed LUST sites are within Jackson County (source MDEQ databases).

### 1.a.iv Cumulative Environmental Issues

The neighborhoods with these brownfield sites have residential neighbors in very close proximity. In addition to the potential environmental risks, residents are exposed to diesel emissions, air and noise pollution from I-94 (the main interstate between Chicago and Detroit) which passes through the target community. US-127 passes through Census Tract 59 and represents an additional source of pollutants. A large asphalt plant is located along I-94 and the predominant westerly winds carry additional air contaminants into the target community (Census Tract 59).

Fifteen private water supply wells are active in Census Tract 59 and over 120 private water supply wells remain in use in the neighborhood immediately adjacent to the Plastigage and Former Harvard Industries sites in Census Tract 55. The residents not connected to municipal water supplies are at risk to exposures from known or unknown sources of groundwater contamination. Even if the wells are primarily for non-potable uses, the access to contaminated groundwater poses an additional environmental exposure. An area-wide groundwater plume of chlorinated solvents has already been identified in Census Tract 55 and there is a possibility that certain residents may be, or have been exposed, to contaminants through ingestion of or contact with groundwater. The area-wide contamination and free-phase petroleum found at the MIHI site may also present a vapor intrusion risk to nearby residents.

Several brownfields in the Target Community, including some of the priority sites, are not secure and residents may be exposed to dusts, contaminated soils, and physical hazards. A trailer park downwind of the Sparton Corp. site is potentially exposed to wind-borne dust from the demolition debris which may contain lead, other heavy metals, or asbestos fibers.

### 1.b Impacts on Targeted Community

These sites and cumulative exposures can cause adverse **impact on the health of the target communities** through the migration of contaminants through air, groundwater, stormwater runoff and vapor intrusion into buildings. The data and observations described above show real risks of actual exposures to contaminants through use of private water supply wells, potentially contaminated dusts, inhalation of diesel emissions, vapor intrusion into nearby residential and commercial structures, direct dermal contact with contaminants as residents, particularly children, are attracted to abandoned sites. Observations indicate that the MIHI site has become an encampment for the homeless.

Data from the Michigan Department of Community Health (MDCH) demonstrates that Jackson County residents suffer from higher than average rates of cancer and low birth weight.

	Jackson County	Michigan
People over 18 years with asthma <sup>1</sup>	11.8%	N/A
Children under 18 years with asthma <sup>1</sup>	1.7%	N/A
Rate of Hospitalizations due to Asthma- 18 years and older (per 10,000 people) <sup>2</sup>	14.9	14.1
Rate of Hospitalizations due to Asthma- 0-17 years (per 10,000 people) <sup>2</sup>	25.8	22.1

Rate of Hospitalizations due to Asthma- black population (per 10,000 people) <sup>2</sup>	31.7	47.5
Rate of Hospitalizations due to Asthma- white population (per 10,000 people) <sup>2</sup>	15.8	11.1
Cancer Rate (per 100,000 people) <sup>1</sup>	185.7	182.4
Low Weight Births (per 1,000 people) <sup>1</sup>	89.8	84.4

<sup>1</sup>Data from the Michigan Department of Community Health 2012 Profiles; <sup>2</sup>Asthma Initiative of Michigan 2007-2012

Unfortunately, **sensitive groups** in the Priority Site areas, such as children, impoverished families, minorities, and pregnant women are more susceptible, and many lack adequate resources to address the negative health effects associated with brownfield sites. In 2012 (the most recent data available), Medicaid insured 43.1% of children in Jackson County under 18 years old (*Kids Count Data Center*). Also in 2012, Medicaid paid for 50.4% of all births in the County (*Kids Count Data Center*). Out of the total births in the County in 2007 (the last year data was collected), 28.1% had less than adequate prenatal care (*Kids Count Data Center*).

The African-American population is significantly more prone to asthma, and with the neighborhood surrounding the Acme, MIHI and former Sparton Corp properties having significant African American populations, this particular sensitive population is more at risk from asthma-triggering impacts from these uncontrolled brownfield sites. Asthma related hospitalizations are the fourth highest cause of hospitalizations among children ages one to 19 (MDCH 2012 Profiles), demonstrating the sensitivity of this population to asthma-triggering impacts. Controlling exposures at priority sites, particularly to airborne contaminants and dusts would represent a benefit to this sensitive population.

In 2011 (the most recent data available), 24.6% of children in Jackson County were living in poverty (*Kids Count Data Center*). There are five school districts located in the target area. Many of these schools provide free or reduced lunches to a significant portion of the student body. Most notably, Hunt Elementary School, serving the neighborhoods adjacent to the Plastigage and Former Harvard Industries site in Census Tract 55, provides free or reduced lunch to 80.6% of its students (*ZIPskinny.com*). On average, 53.1% of students in the county are eligible for free or reduced lunch. These data indicate potential for malnourishment or poor dietary habits. The USDA Food Access Research Map shows all of Census Tracts 2 and 59 as a food desert (low income and low access at one and 10 miles). The lack of multiple healthy and accessible food options for the target community contributes to other health conditions such as obesity, diabetes and its complications. Clearly brownfield redevelopment projects that bring increased access to healthier food choices can bring a transformational change.

The **cumulative effect** of unemployment, poverty, and proximity to sources of environmental contamination has a **disproportionate impact** on residents living near these brownfield sites. Brownfields **adversely impact the welfare of the target community**. These unattractive sites discourage investment, resulting in a cascading devaluation of property in the targeted area, disproportionately higher poverty and crime rates, and increased adverse health risks. The priority sites are a significant detriment to the County tax base where the cumulative potential loss in tax revenues is about \$200,000 per year. During site inspections on many of these properties there was evidence of criminal activity, drug use, and encampments for homeless persons. Data from Jackson County's GIS system shows higher crime levels, particularly in the vicinity of the Sparton/MIHI site in Census Tract 59 compared to other priority sites; 57 crimes recorded in 2014 alone within 0.10 miles of these two sites. Five to eight crimes were recorded in 2014 within 0.10 miles at other priority areas. It would appear that these Brownfield properties are an additional adverse impact on the welfare of residents in the Target Community who are exposed to the negative influences of poverty, crime, drug use at a greater rate than other local suburban neighborhoods.

## 1.c Financial Need

### 1.c.i Economic Condition

Jackson County is still recovering from the effects of the 2009 "Great Recession". According to the Michigan Department of Technology, Management and Budget, unemployment rates in Jackson County rose sharply from 6.4% in April 2008 to 14.1% in December that same year. Throughout 2009-2011, unemployment hovered around 12-14%. While employment rates in some areas have improved and are close to County and State averages, certain areas within the target community (notably, Census Tract 2), remain significantly behind. Based on the demographic information presented above, median household



incomes in the target area are significantly lower than State and National averages, with these neighborhoods classified as low income.

The economic data are reflective of the working class status of Jackson County's residents. Data from the Bureau of Labor Market Information and Strategic Initiatives of Southwest Michigan show a net loss of 2,400 non-farm jobs since 2008 (approximately 5% of all non-farm jobs in the County). This represents an annual loss in income within the County of over \$50 million. The job losses are primarily related to plant closings and layoffs over the past five years. Worker Adjustment and Retraining Notification (WARN) data for Jackson County includes three manufacturing plant closings, three mass layoffs, and three other notifications showing a loss of 810 jobs from these nine locations. Sparton Electronics, with a mass layoff of 206 persons, is a priority site. Other layoffs and smaller plant closings are not included in the WARN data. This has had an impact on property values and tax revenues. Since 2008, total taxable values have dropped by about 10%, resulting in a loss of \$500 million in taxable value, and a loss of tax revenues to the County of \$3-\$4 million per year. Combined with other factors (e.g., a decrease in the State's contribution to local budgets), an ever-decreasing amount of revenue is available to fund programs. The County has no funds in its General Fund dedicated to Brownfield Redevelopment and must rely upon grant funding, such as this Assessment Grant, to jumpstart development on complex sites. There is limited funding in the County's Brownfield Redevelopment Authority (responsible for County Brownfield-related activities) for two to three small projects on an annual basis, but is insufficient to address the identified priority sites.

#### **1.c.ii Economic Effects of Brownfields**

As detailed above, the community has suffered from a significant loss of jobs (5% of all non-farm jobs), wealth, and taxable income (\$3-4 million annually) according to the Bureau of Labor Market Information and Strategic Initiatives of Southwest Michigan. Brownfield sites contribute to this decline. The priority sites alone account for a loss of over 500 jobs and an estimated \$200,000 in annual local property tax revenues (2014 County Equalization Data). At two of the priority sites, taxes are not current, and it is likely that one may revert to the County. One site is already held by the local unit of government and contributes no tax revenue. The effect is not only the loss of revenue, but a cost to maintain abandoned properties (mowing and brush control, security, illegal dumping cleanup, etc.). Further, these properties are a haven for illicit activities, placing a greater burden on short-staffed public safety departments.

The loss of jobs has impacted the lower earnings as evidenced by the demographic information above – showing household income levels in the target community far below County, State, and National averages. Even as these workers have found jobs as shown by improved unemployment rates in Tracts 59 and 55, earnings are still below the County average. In Tract 2, both unemployment rates and average earnings demonstrate that this part of the target community has been disproportionately impacted and has not rebounded as national and state economies improve. Neighborhoods with lower earnings and greater poverty are less attractive to potential developers as the demographic data might not support private investment. The loss of investment and job creation as new construction moves to more affluent, suburban areas is incalculable. The Brownfield sites in the target community potentially present easily accessible economic opportunities for these citizens, instigating transformational change. However, the data demonstrate the need to incentivize such projects at all levels of their planning and development.

## **2. Project Description and Feasibility of Success**

### **2.a Project Description**

#### **2.a.i Project Description**

Jackson County developed a **Strategic Plan** (Jackson 2020) to articulate **goals and vision** in community safety, economic development, public health, education, and effective governance. This Plan was developed with the collaboration of over 20 groups representing local units of government, education, health care, community health and welfare agencies, nonprofits, workforce and economic development. One of the stated goals focuses on intergovernmental cooperation to effect economic development – including at brownfield sites. Site-specific planning activities have also been conducted which included communications with neighboring property owners, local units of government, the MDEQ, discussions at open public meetings, etc. The County has been working with expanding businesses, directing them to brownfield sites. In some cases, this has led to committed development opportunities (e.g., Harvard

Industries). In others, redevelopment of a specific brownfield has led to a neighborhood planning approach. For example, an ad hoc committee has been developing a plan for the neighborhood that includes the former Acme Industries site. This involved a community charrette process attended by the local units of government, neighbors, community leaders, and technical support staff. These efforts have provided elected officials and community leaders, businesses and neighbors with a vision for redeveloping this area and have made it a priority for traffic studies, infrastructure upgrades and additional community planning efforts – all activities that spur investment. This proposed project is consistent with the Jackson 2020 Strategic Plan, the County Strategic Plan and other Action Plans to 1) improve community safety by eliminating the physical hazards and havens for criminal activity, 2) create economic development opportunities, 3) improve public health, and 4) provide education and employment opportunities to residents.

**All of the Priority Sites have strong identified development potential and redevelopment strategies for each site have been identified.** We have engaged in continuous efforts to support redevelopment, market sites, and connect developer and local business expansion with brownfield sites. Based on zoning and area land use, industrial development at most of the priority sites would be the best fit. A business located near the MIHI and Sparton Corp sites has expressed interest in acquiring both for expansion. A manufacturer adjacent to the former Harvard Industries site has acquired the property for expansion and is attempting to attract additional construction and investment. The former Plastigage site has been deemed attractive by several prospective developers based on its size, and proximity to highways and rail. Redevelopment of the Acme site, in a cultural arts and historic district, is likely more geared towards mixed use. Envisioned uses include office and retail space, with possible areas for “pop-up” businesses or activities. However, without funding to assess the environmental issues, development interest is deterred due to the costs and uncertainties of such conditions. Assessment grant funds would be used to conduct **assessment and cleanup planning activities** at Priority Sites. **Assessment activities** would be primarily centered on providing developers liability protection and ensuring that the proposed use of the site is protective of human health and the environment. **Cleanup planning** for engineering barriers, management of excess contaminated soil, removal of demolition debris, and building demolition will be needed, both technically and financially. We expect the **outputs** to include Phase I ESAs compliant with AAI and ASTM Standards, Phase II ESAs, liability protection documents, Due Care Plans, Tax Increment Capture (Brownfield) Plans, Work Plans, and other documents that detail cleanup plans, costs, incentives, etc. Minutes from public meetings, correspondence with the public, brochures and communications to the business community and other outreach components will also be expected outputs.

Priority Area/Site	Anticipated Development	Assessment needs	Anticipated Grant Costs
Former Harvard Industries	<i>Committed</i> Developer in place. New industrial operation to expand local manufacturer, new construction of commercial space	All Appropriate Inquiry (AAI), contaminant delineation, vapor intrusion investigation, asbestos survey, cleanup planning.	\$25,000 (petroleum) \$25,000 (hazardous substance)
Former Sparton Corp.	Development potential for industrial use. Possible expansion of nearby industrial operation onto property	AAI, soil and groundwater investigation, cleanup planning for contaminated demolition debris, asbestos survey.	\$35,000 (hazardous substance)
Michigan Industrial Holdings	Development potential for industrial use. Possible expansion of nearby industrial operation onto property	AAI, soil and groundwater investigation, delineate free phase product, vapor intrusion investigation	\$ 30,000 (petroleum)
Former Plastigage	New Construction of Industrial/Commercial Space	All Appropriate Inquiry (AAI), contaminant delineation to support construction planning, liability protection, vapor intrusion investigation, cleanup planning for contaminated demolition debris and	\$20,000 (hazardous substance)



		contaminated surface soil removal.	
Former Acme Site	New construction of mixed use commercial space, redevelopment of one historic building	AAI, contaminant delineation to support construction planning, liability protection, planning for vapor barriers or engineering control, cleanup planning for contaminated demolition debris.	\$15,000 (hazardous substances) \$15,000 (petroleum)

In addition to these high priority sites, we envision four to six additional projects on smaller, former industrial sites in the Target Community. The types of redevelopment projects typically encountered include repurposing abandoned industrial sites near downtown areas for mixed commercial use with residential lofts, and new construction. We would also wish to assist the local community housing development organization, Community Action Agency (CAA) with its efforts to remove or rehab blighted abandoned homes in the target community. Hazardous material surveys, assessment or removal of home heating oil tanks, etc. help CAA leverage HUD funds in this neighborhood stabilization effort. CAA may have two to three relatively small-scale projects each year of this nature. As cleanup and redevelopment plans are prepared, we plan to communicate the viability for development of the property to the affected community, business leaders, local lenders, local units of government, and others. Our partnerships with various business and community groups will aid in this effort.

#### **2.a.ii Project Timing**

Jackson County is not new to Brownfield Redevelopment. We have in place a seasoned project team, established procedures for acquiring professional service provider(s), policies for site selection and project evaluation, site access, and other operational functions related to Brownfield Redevelopment. The County will implement the grant through its Brownfield Redevelopment Authority (BRA); established by Michigan law with broad powers to aid in redevelopment. The BRA is staffed by the Enterprise Group of Jackson – an economic development agency with broad capabilities and experience to aid in complex brownfield redevelopment projects. Amy L. Torres is the Executive Director of the BRA and will manage the project including evaluation of potential requests for assessments, obtaining site access, procurement of technical service providers, etc. We envision that upon award, we will immediately begin the contractor procurement process. We would expect the contractor to prepare a Quality Assurance Project Plan within the first 60 days of the grant so that assessment activities are not delayed. Based on our experience, the efforts to date regarding the priority sites, and the established operational and organizational processes, there would be no delay in the use of funds. Based on our pre-planning efforts, we are ready to make full use of the funds during the three-year grant period.

#### **2.a.iii Site Selection**

The County BRA has adopted an Application Form and Scoring System to evaluate sites for the use of Assessment grant funds. Potential projects/sites are selected based on the following parameters: eligibility criteria, strength of redevelopment business plan, financial commitments; amount of investment, job creation; amount of property taxes generated; proximity to the Target Community, whether the project is leveraged by other previous brownfield redevelopment efforts; compliance with zoning, Master Land Use Plan, and support from the Local Unit of Government; the extent to which environmental conditions are alleviated, sustainability factors, energy efficiency factors, and project amenities. These same program evaluation factors match the desired outcomes of the Assessment Grant Project. Funding decisions are made at an open meeting of the BRA based on staff recommendations of project viability and with opportunity for public input. There are several priority sites where we anticipate using the Assessment Grant, sites that have been scored and consistently ranked as some of the most important and deserving of public support of redevelopment efforts. Through policy, the Authority secures property access through the property owner's consent – usually documented in a Purchase Agreement.

## **2.b Task Description and Budget Table**

### **2.b.i Task Description**

#### **Task 1: Phase I Environmental Site Assessments (ESAs):**

This Task will involve the completion of ESAs following ASTM and All Appropriate Inquiry (AAI) standards using qualified environmental consultants. The Budget estimates five Phase I ESAs at Priority Sites using Hazardous Substance Grant funds (total \$22,000). The Petroleum Assessment Grant budget assumes seven Phase I ESAs (total \$25,000). Phase I ESAs costs for the types of properties anticipated under this grant typically range from \$2,500 – \$5,000. Costs in this task also include Eligibility and ACRES updates. Total outputs anticipated: 12 ASTM/AAI compliant Phase I ESAs.

#### **Task 2: Environmental Investigations (Phase II ESAs and Liability Protection):**

Conduct Phase II ESAs, prepare documents for liability protection and Due Care Plans to address "continuing obligations" following MDEQ guidelines as agreed in the *Brownfield Memorandum of Understanding* between EPA and the State of Michigan. Services will be completed using a qualified environmental consultant. This task also will include the preparation of a Quality Assurance Project Plan (QAPP), Sampling and Analysis Plans and Health and Safety Plans (HASP). The Hazardous Substances budget assumes five environmental investigations in varying degrees of complexity ranging from \$10,000 to \$60,000 for a total task budget of \$130,000. The Petroleum Assessment budget assumes seven investigations ranging in cost from \$12,000 to \$50,000 for a total task budget of \$137,000. Total outputs anticipated: one QAPP, 12 Sampling and Analysis Plans, 12 HASPs, 12 Technical Reports of Field Investigations, Work Plans and Liability Protection Documents.

#### **Task 3: Cleanup Planning:**

The funds will be used in association with any of the priority sites to prepare Brownfield Plans, Redevelopment Plans, Conceptual Site Plans and other documents that communicate future land uses, construction and development related challenges, costs and obligations for a safe redevelopment project. Funds within this task may also be used in efforts to secure leveraged support from the MDEQ, Michigan Strategic Fund, and other programs and agencies that can support the redevelopment. \$30,000 of the Hazardous Substances Assessment Grant funds and \$25,000 of the Petroleum Assessment Grant funds will be dedicated to support these activities. Total Anticipated Outputs: up to five technical documents outlining conceptual cleanup, redevelopment plans and financial resources to be deployed (\$11,000 each).

#### **Task 4: Community Outreach, Programmatic Expenses & Travel:**

This task involves activities related to community outreach including:

- Registration and travel to the National Brownfield Conference and other pertinent educational and training events.
- Preparing for, attending, and participating in public hearings and hearings, and Authority meetings. Working with MDEQ and Health Department to strategize communications to the public.
- Educating and informing community groups, realtors, developers and interested parties about the Grant and benefits of Brownfield Redevelopment. Interaction with neighborhood groups and project partners.
- Hosting community sessions to communicate redevelopment progress and secure input for equitable and sustainable development outcomes (e.g., considering end uses for properties, community involvement and promoting job opportunities).
- Create and disseminate brochures about Brownfield Redevelopment and other outreach activities.
- Outputs would include printed materials, minutes and agendas from public meetings, presentation materials, website content.

All estimated costs for technical activities described above are based on our experience and awareness of pricing in the marketplace. Travel costs assume two persons attending a National Brownfield Conference (two events during the grant period) and two local State-specific brownfield conferences in each fiscal year. Travels costs are based on an assumed flight cost of \$625 per person (\$2,500 total); car rental (\$40/day for 8 days = \$320); hotel fees of \$150/night (8 nights total during the grant = \$1200); and incidentals (\$500 total). Fees to attend local events are modest (about \$40 per event x 12 = \$480). The Enterprise Group will donate staff time to manage the grant. The cost for administering the Authority inclusive of development of agendas and administering meetings, printing costs, program promotion, cross-marketing the brownfield program to other groups and local units of government, securing technical services through a competitive process, updates to partners and the County is a cost share that is donated time by Staff and partners. This

**donation of time and resources** is estimated to average 15 hours per month which at \$35/hour represents a minimum leveraged value of \$19,000 over the grant period (\$6,300 per year).

## 2.b.ii Budget Table Hazardous Substances Assessment Grant

Budget Categories	Task 1 Phase I ESAs	Task 2 Environmental Investigations	Task 3 Cleanup Planning	Task 4 Community Outreach, Programmatic Expenses & Travel	Total
Personnel				\$ 9,500	\$ 0 (in kind donation)
Fringe Benefits					
Travel				\$ 2,500	\$ 2,500
Equipment					
Supplies					
Contractual	\$ 22,000	\$ 130,000	\$ 30,000	\$ 15,500	\$197,500
Other					
Total	\$ 22,000	\$ 138,000	\$ 30,000	\$18,000	\$200,000

## Petroleum Assessment Grant

Budget Categories	Task 1 Phase I ESAs	Task 2 Phase II ESAs and Liability Protection	Task 3 Cleanup Planning	Task 4 Community Outreach, Programmatic Expenses & Travel	Total
Personnel				\$9,500	\$ 0 (in kind donation)
Fringe Benefits					
Travel				\$ 2,500	\$ 2,500
Equipment					
Supplies					
Contractual	\$ 25,000	\$ 137,000	\$25,000	\$ 10,500	\$197,500
Other					
Total	\$ 25,000	\$ 137,000	\$25,000	\$13,000	\$200,000

## 2.c Ability to Leverage

The County BRA **pledges funds** that have been raised through Brownfield Plans, Tax Increment Finance capture, and Brownfield Revolving Loan Fund repayments to leverage this USEPA Assessment Grant request. To date, the Authority has \$86,560 to support future brownfield projects in Jackson County and thereby leveraging the support of the Grant. The County will also seek funding from a variety of resources to leverage Grant monies. Where possible, the County can secure grant or loan funds from the MDEQ for assessment and cleanup activities. Both grant and loan funds are awarded on a competitive basis with up to \$1,000,000 available. The Michigan Strategic Fund Community Revitalization Program provides grant and loan funds for demolition, asbestos abatement, infrastructure, and other site improvements. These funds are extremely competitive, and the amount of funding is need-based. For assistance in the Cleanup Planning and Community Engagement activities, we may seek assistance from the TAB programs which would leverage our resources.

We may also pursue leveraged support from the Jackson Community Foundation, which has identified projects that address environmental issues, sustain economic development and contribute to a

healthy, vibrant community as consistent with its principal goals. Where there is a specific activity that could be funded or a funding shortfall, and there is consistency with the Foundation's mission, we can seek financial support. Our work with the Community Action Agency leverages HUD-managed funds. In December 2014, \$5.5 Million was awarded to the City of Jackson through HUD's Hardest Hit Fund program for blight elimination and work to reduce foreclosures. Our work using the Assessment Grant to work collaboratively with Community Action Agency and their HUD funds represents a collaborative effort of federal funds to accomplish local initiatives.

Where tax increment financing (TIF) can be employed, the County will aggressively evaluate and pursue such options. Through "Brownfield Plans" the BRA is capturing tax increment on several completed projects. Such a plan is in place at the former Harvard Industries (a priority site) and has the potential to provide the developer with a revenue stream of up to \$1.5 million for eligible environmental cleanup costs. While some of the collected revenues are pledged to repay eligible expenses by developers, the Authority does retain a significant portion of the funds based on its previous costs. Several projects in the pipeline are expected to yield increases in taxable value in 2014 and beyond, significantly boosting the income of the program (estimated annual income at \$25,000 - \$30,000). **The Brownfield Redevelopment Authority will use this annual income** to continue to support the activities of the Assessment Grant either by co-funding work completed through the grant, paying for non-eligible costs that are vital to a project's success, or paying for the oversight costs associated with the execution of the County's program.

The cost for administering the Authority is being donated by Staff and partners. This **donation of time and resources** is estimated to average 15 hours per month, which at \$35/hour represents a minimum leveraged value of \$19,000 over the grant period (\$6,300 per year).

### **3 Community Engagement and Partnerships**

#### **3.a Plan for Involving Targeted Community and Other Stakeholders and Communicating Project Progress**

##### **(i) Community Involvement Plan**

Jackson County understands that it will be critical to have open and ongoing communications to effectively implement this project. Due to the complex nature of some of the Priority Sites and the potential public health exposures, affected neighboring residents and businesses will be engaged to ensure that decisions being considered by the Authority address their concerns.

There are no established neighborhood groups or organizations in the areas of the Priority Sites offering an existing communication network. Thus, in order to **involve the affected community** it will be necessary to coordinate these efforts on our own. We envision community-based meetings at key stages in the project to inform the public of redevelopment activities, held at locales near brownfield sites (such as churches) most accessible to the affected residents. Through targeted direct mailings, we will provide information on projects, meetings, and provide opportunities for input and questions. Similarly, we can post notices of public meetings at local establishments such as grocery and convenience stores, libraries, and restaurants. For collaborative projects with Community Action Agency, we will work with their established network to organize neighborhood outreach events. At these meetings we will also disseminate information on existing job training and worker placement programs to help connect residents with economic and job opportunities that may become available through the redevelopment.

Through communications with local units of government, i.e., Township Supervisors and Trustees, presentations at public meetings, etc. we can educate local leaders, media, and involved residents about project goals, progress, and outputs. We can use these forums where appropriate to hold public hearings to formally solicit input from the affected community. We will also utilize websites and social media. The Authority maintains a website and regularly posts information, Brownfield Plans, and meeting minutes. This website also provides technical information, Authority Staff contact information, notice of open meetings where the public participation is invited, and other resources that inform the citizens of specific issues at local sites and the resources to help them understand, evaluate and voice their concerns about the brownfields in their neighborhood. Regarding complex or sensitive public health issues, it may be necessary to involve health professionals that have the skills to communicate such information. County Health Department staff are available to assist in this area. Additionally, we may reach out to TAB and/or the Agency for Toxic Substances and Disease Registry to assist in these situations. In the past we have

established repositories for technical documents at the Public Library, and also disclose technical reports to the MDEQ, thereby making information available to the public.

The business community in the target area and the County will also be involved to ensure they are informed of redevelopment opportunities on Brownfield sites and the potential incentives available through the Assessment Grant and County's Brownfield Redevelopment program. This plan will be accomplished through partnerships including The Jackson Area Chamber of Commerce, The Enterprise Group and Jackson Area Manufacturers Association, Jackson Area Association of Realtors, and others. For example, the Authority hosted a "Community Outreach for Commercial Lenders" event in summer 2010 that brought together local commercial lenders to inform them of available financial incentives related to brownfield redevelopment. Efforts will be made to educate the business community about the program and its benefits through presentations, news articles in the newsletters of our partners, open houses, attendance at community events, etc. The Authority has a strong partnership with the local Chamber of Commerce and can work with it to further involve the business community. The Authority can avail itself of local radio and cable television programs which feature daily guests in a news-talk format. These outlets provide a platform for the Authority to **promote the availability, progress, and success of the Brownfield Redevelopment program**, specifically the Assessment grant, and involve the community.

The Authority meets on a regular basis; dates and times are posted, are open to the public, and include an opportunity for the community to express their concerns and provide input. We will continue to hold these meetings and provide this opportunity for public participation. In addition to website posting, all partnership entities receive e-mail notifications of the meetings and the agenda packets.

#### **(ii) Communicating Progress**

The Authority regularly tracks various metrics (**outcomes**) of the redevelopment projects it supports. These are required to be reported annually to the Michigan Strategic Fund. Data includes level of investment, job creation, tax increment collected and disbursed, square footage of new construction and residential rehabilitation, and the amount of public infrastructure created. These data are uploaded onto a publicly available database maintained by the State. The annual reports are available locally to the public through the Authority. Throughout the grant, we track additional metrics related to environmental expenditures, assessment activities, cleanup activities, etc. that are uploaded into USEPA's ACRES database and in Quarterly Reports. These are also publicly available. Through the public's access to these data and implementation of the Community Involvement Plan, there are ample opportunities to share progress and program successes. Project metrics are also reported monthly by The Enterprise Group on its monthly scorecard, which is posted on line and broadly emailed to stakeholders.

Based on the size and structure of the community, we believe the above-described methods are the most effective means to have meaningful engagement. We believe they provide open avenues of two-way communications to inform the public of the program's efforts, and the Project Team is aware of the community's needs and desires, and will help connect residents affected by the brownfield sites to the opportunities arising from redevelopment. American Community Survey data shows that English is spoken in most households including minority populations, and there are no significant language barriers.

### **3.b Partnerships with Government Agencies**

#### **3.b.i Partnerships with Local/State/Tribal Environmental Authority**

We have developed a strong and ongoing working relationship with the MDEQ, the agency in the State of Michigan assigned with the protection of human health and the environment. We have worked with the MDEQ on various assessment, cleanup and redevelopment projects throughout the County. For example, using its USEPA Section 128(a) funds, MDEQ supported assessment activities at the former Acme Industries (one of the priority sites). MDEQ has worked with the Authority as we tackle a local airport runway alignment project that will require removal of an old municipal dump site. The MDEQ provided a low interest loan (\$228,965) for the redevelopment of a former Ford Motor facility, which helped clean up the property and ready it for development. It is now privately owned and development activities are scheduled to begin in 2015. Local MDEQ staff we primarily work with include Mitch Adelman (Remediation Division Supervisor) and Lori Aronoff (Project Manager for Jackson County). They are involved in review of work plans, cleanup plans, and other cleanup/liability protection documents integral to the redevelopment process. They provide additional expertise related to liability and funding issues, regulatory requirements, and access to technical support on such issues as vapor intrusion and impending regulatory matters.



Where U.S. SBA loans are used by local businesses, MDEQ approves cleanup plans and/or Due Care plans to meet SBA's environmental policy requirements. If school taxes will be captured through a Brown-field Plan, it will be necessary for MDEQ or the Michigan Strategic Fund to review and approve the plan.

### **3.b.ii Other Relevant Governmental Partnerships**

The County and its BRA have collaborated with other governmental agencies to advance redevelopment projects. The Jackson County Land Bank Authority (Land Bank) can acquire, demolish, rehab, dispose of, and hold tax-reverted properties, rapidly returning them to productive use. Together, the BRA and the Land Bank can leverage many of the brownfield tax increment tools to further enhance incentives including site preparation activities, installation or rehabilitation of infrastructure, and other benefits. The Land Bank has also partnered with the local Habitat for Humanity and the Community Action Agency to assist in rehabilitations of residential properties or new construction on formerly blighted sites. Through our collaboration with Community Action Agency, we are able to partner with HUD in redevelopment/rehabilitation projects.

The Michigan Economic Development Corporation (MEDC) and its Michigan Strategic Fund (MSF) provide numerous Brownfield Redevelopment incentives related to non-environmental issues such as demolition, asbestos abatement, public infrastructure needs, and site preparation. Involvement is focused on traditional urban core projects; the redevelopment of the Acme Industries site would meet these requirements. Their involvement and support would include review of Work Plans to provide the State's portion of tax increment revenues to the redevelopment project. The MEDC also administers the Community Revitalization Program focused on providing performance-based grants and loans to projects in traditional downtown areas. MEDC also provides access to other State and federal funds such as Community Development Block Grant funds, technical assistance, planning activities (such as housing studies), and a plethora of programs and incentives to support community development and brownfield redevelopment. Their role is critical as it helps leverage funds for the cost of non-environmental activities associated with the redevelopment projects.

We may also reach out to TAB and/or the Agency for Toxic Substances and Disease Registry to assist in community/site planning and communications with the public. We are aware of the role TAB and ATSDR can play to assist us in visioning success on specific properties, developing baseline data to track health metrics, engage with the community, and other important aspects of redevelopment on complex sites.

### **3.c Partnerships with Community Organizations**

#### **(i) Community Organization Description and Role**

The following organizations have graciously accepted our call to action and will play an important role in the implementation of the EPA Assessment Grant: **The Greater Jackson Area Chamber of Commerce** provides support and promotion for brownfield redevelopment in the business community. Through newsletters and hosted events, the Chamber offers a direct line of communication to Jackson's business community to promote the Assessment Grant, elicit public involvement, promote successes, and seek out potential users of the Assessment Grant funds. **The Enterprise Group** is a County-wide economic development corporation provides expertise in a variety of economic development incentives to support complex brownfield redevelopment projects.

We will rely on several organizations that provide support for worker training and workforce development to assist residents in the target areas with skill development and job placement, connecting them to the economic opportunities that result from brownfield redevelopment. These include:

**Jackson Area Manufacturers Association (JAMA)** provides job placement opportunities and access to skilled work force training programs, including its apprenticeship program which was highlighted by President Obama at a White House event in January 2014.

**South Central Michigan Works!** - Regional workforce development agency engaged in a variety of economic development programs. They help connect the public with the job opportunities created by business expansions and redevelopment projects in the County. This is accomplished through Pure Michigan Talent Connect - a statewide database of 38,000 job openings used by 55,000 employers, containing 600,000 resumes.



*Baker College* - A nonprofit career college committed to job growth and creation. Baker College provides a venue for community outreach events hosted by the Authority. Additionally, faculty and administrators will review projects and plans pro bono, helping ensure that the Authority uses funds on projects that have a strong likelihood of success.

*Jackson College* - Jackson College (JC) will serve as an educational and economic force for Jackson County. JC will offer job training, commercial opportunities, and access to jobs, and will work to help promote local entrepreneurial activities.

*Community Action Agency* is a valued partner helping convert blighted residential properties into new homes through partnerships with the Land Bank and Habitat for Humanity. They are able to help us broadcast the benefits of this Grant and the Brownfield program to affected citizens. CAA connects many of Jackson County's underprivileged population to a variety of support services including the job placement services identified above.

*Jackson Community Foundation* - The Foundation is dedicated to improving the lives of all citizens of greater Jackson. It will support the brownfield program by helping promote the success of the program. In addition, we look for ways that the Foundation can provide financial resources, particularly for areas where there is a funding gap in the project and a strong overlap with the Foundation's mission.

#### **(ii) Letters of Commitment**

Letters of Commitment from the Community Organizations are attached.

### **4 Project Benefits**

#### **4.a Health and/or Welfare and Environment**

##### **(i) Health and/or Welfare Benefits**

As brownfield sites are assessed, cleaned up and redeveloped, there are opportunities to eliminate and/or control risks of exposure to petroleum and hazardous substances. Sites that control or mitigate vapor intrusion from VOCs eliminate exposures to potential carcinogens and help address cancer risks. The use and development of sites would eliminate exposures to surface contaminated soils by trespassers and or through the inhalation of windborne dusts. Improvements to uncontrolled sites help minimize the public's risk of exposure to lead, heavy metals, and dusts that may trigger asthma attacks and provides a benefit to those sensitive populations.

We anticipate a benefit in the welfare of the target community through the redevelopment projects which provide opportunities for new jobs and increased wages, eliminate blighted conditions, and remove areas where criminal activity has a safe haven. Blight removal will have positive effects on the neighborhood and encourage additional investment and improvement.

##### **(ii) Environmental Benefits**

We expect redevelopment activities at the priority sites to result in the removal and/or control of environmental contaminants. At the former Harvard Industries site, demolition activities are being incentivized, allowing access to contaminated soils beneath the building. Removal of these potential groundwater contaminant sources provides an environmental benefit. Vapor barriers and controls associated with the redevelopment of the Acme and MHI sites will mitigate exposures to VOC vapors. Redevelopment of the Sparton Corp site will eliminate a large pile of demolition debris which may be a source of contaminated dusts and stormwater runoff. The Acme site sits on the banks of Michigan's longest river, the Grand River, and improvements to stormwater controls would provide ecological benefit to this ecosystem. Through the redevelopment process at these and other sites we expect to see environmental improvements to stormwater controls, elimination of the runoff of contaminated sediments, and placement of engineered barriers to prevent exposures to vapors and surface contaminated soils.

#### **4.b Environmental Benefits from Infrastructure Reuse/Sustainable Reuse**

##### **4.b.i Planning, Policies, Ordinances or Other Tools**

Local ordinances have been in place to promote sustainable redevelopment, particularly within the City of Jackson where policies and ordinances promote water quality through improved stormwater controls, create additional green spaces in the community, promote energy-efficient site and street lighting, etc. Redevelopment at the priority sites will make use of existing infrastructure and relieve pressures on urban sprawl. Runoff entering the Grand River will be ameliorated through improved stormwater control. We routinely connect redevelopers with recyclers in the area that minimize the disposal of demolition and

construction debris. Consumers Energy, one of the nation's largest energy suppliers, is headquartered in Jackson and has a host of energy efficiency programs available to developers.

#### **4.b.ii Integrating Equitable Development or Livability Principles**

During site planning processes with developers, we use the negotiated process of offering incentives to encourage (or possibly mandate) improvements that advance principles of equitable development and livability. For example, the neighborhood planning process for reuse of the Former Acme Site has included a strong focus on the pedestrian connection with the downtown city center. Specifically, a multi-modal trail exists near the site and redevelopment could provide additional access to this trail. We envision providing preference and increased incentives to developers who embrace the opportunity to improve the community's transportation choices by including trail improvements in their project.

Our collaboration with Community Action Agency allows us to help provide the target community with quality affordable housing. These efforts help stabilize neighborhoods, eliminate blight and encourage further investment in both residential and non-residential sites.

#### **4.c Economic and Community Benefits (long term benefits)**

##### **4.c.i Economic or non-Economic Benefits**

The County's project is primarily focused on securing economic benefit for the target community and County. The County has seen the tangible economic benefits that result from brownfield redevelopment projects. Previous efforts leveraged \$46,000,000 in private investment into brownfield sites, retained 128 jobs, and created 200-225 new jobs. The **expected outcomes** from this proposed project will be new economic investment and job creation, improved employment metrics across the County, and new taxable value and revenues to the local unit of governments. Based on other projects that have been managed in the past, we are anticipating the following outcomes at Priority Sites:

<b>Priority Area/Site</b>	<b>Potential Investment</b>	<b>Potential Job Creation</b>	<b>New Tax Revenues to Local Unit of Governments</b>
Former Harvard Industries	\$2,600,000 in new construction	20 – 50 new jobs	\$25,000/year
Former Sparton Corp.	\$100,000	5-10	\$10,000/year
Michigan Industrial Holdings	\$100,000	5-10	\$10,000/year
Former Plastigage	\$1,000,000 in new construction	10-25	\$20,000/year
Former Acme Site	\$1,000,000 in new construction and renovation of historic building	10-30	\$25,000/year
<b>TOTAL</b>	<b>\$4.8 Million</b>	<b>50 – 125 new jobs</b>	<b>\$90,000/year</b>

##### **4.c.ii Job Creational Potential (Partnerships with Work Force Development Programs)**

All project developers funded by the Assessment Grant will be given information about the organizations providing support for worker training and workforce development (itemized above in *Community Partnerships*). We will rely upon these organizations to assist residents in the target community with skill development and job placement, allowing them to be connected to the economic opportunities resulting from brownfield redevelopment projects. In addition, the local economic development agency (The Enterprise Group) maintains an extensive list of suppliers and support businesses that can promote local procurement. Consumers Energy, headquartered in Jackson, has assisted the MEDC in creating a database of Michigan-based businesses, accessible on line and containing many local businesses and vendors to promote "Buy Local" and solicit local employment opportunities. Through these existing efforts we hope to connect residents in the affected community with the economic opportunities created through redevelopment. There is no Brownfield job training grantee that serves the project area.

## **5 Programmatic Capability and Past Performance**

### **5.a Programmatic Capability**

The County has an **established team** that is capable of implementing the anticipated projects using the Assessment Grant and other tools that leverage the Grant's value. We are an experienced team of economic and brownfield development professionals with the skill to assemble complex projects using incentives from multiple agencies and sources. The County will utilize its BRA which is staffed by Amy Torres and Debbie Kelly of the Enterprise Group of Jackson (EG), each of whom have over 15 years of direct experience managing Brownfield Redevelopment Authorities and related programs. Amy Torres has been involved with economic development since 2003, and is currently Vice President of Economic Development for The EG. Debbie Kelly has been involved with economic development since 1999, and is currently Director of Marketing for The EG. In the event of turnover, either Amy or Debbie is capable of managing the entire program during a transition period. In addition, the CEO of The EG, Tim Rogers, is capable and willing to lend additional executive support. The County and Authority will engage a private consulting firm(s) (in compliance with 40 CFR 30, 31 and 33) for technical expertise beyond that provided by the MDEQ. Legal Counsel for the Authority is provided by Diane Bower of Marcoux, Allen, et al. who provides review of contracts, property access agreements, development and reimbursement agreements, loan documents, and other issues as needed. MDEQ Staff, Mitch Adelman (Remediation Division Supervisor) and Lori Aronoff (Project Manager for Jackson County), are regularly updated and consulted, providing expertise related to liability and funding issues, regulatory requirements, and access to technical support. In addition to these key players, the program is supported by various partners who assist in evaluating the business viability of redevelopment plans, broadcasting the successes and opportunities of the project to the public and business community, etc. The Authority meets monthly at publicly noticed meetings, has developed policies, site selection criteria, application forms, development and reimbursement agreements, access agreements, reporting forms, and other procedures that allow us to effectively complete the work associated with this grant without delay; some of which have been held up as models for other communities by State and EPA officials.

### **5.b Audit Findings**

133. Jackson County and the BRA have never had adverse audit findings as related to OMB Circular A-

### **5.c Past Performance and Accomplishments**

#### **5.c.i Currently or Has Ever Received an EPA Brownfields Grant**

##### **1. Compliance**

Jackson County previously had the following U.S. EPA Brownfields Assessment Grants:

- Brownfields 1999 Assessment Pilot, \$200,000 and Supplemental Assessment Pilot \$150,000. These funds have been completely expended. The County consistently met the requirements for QAPP development, eligibility determinations, Sampling Plans, HASPs, Quarterly Reports, Property Profile Sheets, Financial Status Reports, Community Notification and close-out documentation.
- Brownfields 2004 Assessment Grant, \$400,000. These funds have been completely expended. The County consistently met the requirements for QAPP development, eligibility determinations, Sampling Plans, HASPs, Quarterly Reports, ACRES updates, Financial Status Reports, Community Notification and close out documentation.

##### **2. Accomplishments**

Using the Assessment Pilot, the Authority successfully completed a Site Inventory, and completed assessment activities at several sites which included supporting development of the new Consumers Energy Headquarters in downtown Jackson – a Phoenix Award Winner (People's Choice). Using the Assessment grant, the County successfully completed assessment activities at seven sites including extensive assessment activities at one large site (Armory Arts), where a former prison and armory was converted into residential space. These funds leveraged \$13,000,000 in private investment and created 200 jobs.

### Appendix 3 Assessment Other Factors Checklist

Name of Applicant: JACKSON COUNTY, MICHIGAN

Please identify (with an X) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
	Community population is 10,000 or less.	
	Federally recognized Indian tribe.	
	United States territory.	
	Applicant will assist a Tribe or territory.	
	Targeted brownfield sites are impacted by mine-scarred land.	
	Targeted brownfield sites are contaminated with controlled substances.	
	Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress.	
X	Project is primarily focusing on Phase II assessments.	8-9
X	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	9-10
X	Community experienced manufacturing plant/power plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant/power plant closures due to bankruptcy or economic disruptions.	5 AND ATTACHMENT
	Recent (2008 or later) significant economic disruption ( <u>unrelated</u> to a natural disaster or manufacturing/auto plant/power plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	
	Applicant is one of the 12 recipients, or a core partner/implementation strategy party, of a "manufacturing community" designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, <b>applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation</b> which demonstrate either designation as one of the 12 recipients, or relevant pages from a recipient's IMCP proposal which lists/describes the core partners and implementation strategy parties. A core partner/implementation strategy party is a local partner organization/jurisdiction that will carry out the proposed strategy, as demonstrated in letters of commitment or memoranda of understanding which documents their contributions, roles, and responsibilities to the partnership. EDA may provide to	

	EPA a list of the core partners/implementation strategy parties for each of the 12 “manufacturing community” designees, which EPA would use to verify this other factor.	
	Applicant will serve an area designated as a federal, state, or local Empowerment Zone or Renewal Community. To be considered, <b>applicant must attach documentation</b> which demonstrates this current designation.	
	Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, <b>applicant must attach documentation.</b>	
	Applicant is a HUD Promise Zone community. To be considered, <b>applicant must attach documentation.</b>	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

Jackson County*				
Company Name	City	Date Received	Incident Type	Number of Employees Lost Due To Layoffs
Hostess Brand	Jackson	05/07/2014	Other	13
Consumer Services	Jackson	2/2/2011	Other	23
Jackson Citizen-Patriot	Jackson	11/7/2011	Mass Layoff	71
Sparton Electronics	Jackson	3/4/2009	Mass Layoff	206
Call Center HR	Jackson	3/16/2009	Other	5
Milsco Manufacturing	Jackson	5/8/2009	Plant Closing	93
Kaneka Texas Corporation	Jackson	4/21/2008	Plant Closing	50
Kaneka	Jackson	6/2/2008	Plant Closing	50
Gerdau Macsteel	Jackson	12/29/2008	Mass Layoff	299

\*Michigan Department of Technology, Management and Budget

WARN (Worker Adjustment and Retraining Notification) Data from 01/01/2008-12/01/2014

**Plant closing:** A covered employer must give notice if an employment site (or one or more facilities or operating units within an employment site) will be shut down and the shutdown will result in an employment loss\* for 50 or more employees during any 30-day period.

**Mass layoff:** A covered employer must give notice if there is to be a mass layoff which does not result from a business closing, but will result in an employment loss\* at the employment site during any 30-day period for 500 or more employees, or for 50-499 employees if they make up at least 33% of the employer's active workforce.

**Other:** Indicated a Layoff or Plant Closing of less than 50 employees at one time.



### Threshold Criteria for Assessment Grant

#### **Applicant – Jackson County (County), Michigan**

*1. Applicant Eligibility*

Jackson County is a general purpose local unit of government.

*2. Letter from the State of Michigan*

The County received a letter from the Michigan Department of Environmental Quality (MDEQ) acknowledging the County's plan to conduct assessment activities through the pursuit of Federal grant funds. Please refer to attached letter.

*3. Community Involvement*

The Jackson County Brownfield Redevelopment Authority is the County entity that will implement grant activities. The County understands that it will be critical to have open and ongoing communications to effectively implement this project. We envision community-based meetings at key times in the project to inform the public of redevelopment activities. Such meetings would be held at locations near brownfield sites such as churches most accessible to the residents affected by the redevelopment project. We will inform the public through targeted direct mailings that provide information on projects, meetings, and provide opportunities for input and questions. Similarly, we will post notices of public meetings at local establishments frequented by residents such as grocery and convenience stores, libraries, and restaurants. We will collaborate with other community organizations that have established networks and capabilities to engage the community. We will also work with local units of government. Through communications with Township Supervisors and Trustees and presentations at public meetings we can educate local leaders, media and involved residents about project goals, progress and outputs. We will also utilize websites and social media. Additionally, we may reach out to TAB and/or the Agency for Toxic Substances and Disease Registry to assist in our efforts. We have established repositories for technical documents at the Public Library, and also disclose technical reports to the MDEQ, thereby making information available to the public.

We will engage the business community and prospective developers through partnerships and existing networks including The Jackson Area Chamber of Commerce, The Enterprise Group (the County's Economic Development Corporation), Jackson Area Manufacturers Association (JAMA), Jackson Area Association of Realtors, and others. For example, the Authority hosted a "Community Outreach for Commercial Lenders" event in summer 2010 that brought together local commercial lenders to inform them of available financial incentives related to brownfield redevelopment. Efforts will be made to educate the business community about the program and its benefits through presentations, news articles in the newsletters of our partners, open houses, attendance at community events, etc.

At public events we will disseminate information on existing job training and worker placement programs to help connect residents with economic and job opportunities that may be available through the redevelopment.

The Authority meets on a regular basis. These meetings, dates and times are posted, are open to the public, and include an opportunity for the public to address the Authority, express their

concerns and provide input. We will continue to hold these meetings and provide this opportunity for public participation. In addition to posting, all partnership entities receive e-mail notifications of the meetings and the agenda packets. The Authority regularly tracks various metrics (**outcomes**) of the redevelopment projects it supports including levels of investment, job creation, tax increment collected and disbursed, number of square feet of new construction, number of square feet of residential rehabilitation, and the amount of public infrastructure created. These data are uploaded onto a publicly available database maintained by the State. The annual reports are available locally to the public through the Authority. We will track additional metrics related to environmental expenditures, assessment activities, cleanup activities, etc. that are uploaded into USEPA's ACRES database and reported in Quarterly Reports. These reports are also publicly available. Further, the Enterprise Group reports brownfield project metrics in its monthly scorecard, posted on its website and widely distributed to stakeholders. Meeting notices and project information are also posted on the Enterprise Group's social media channels including Facebook, LinkedIn, and Twitter.

Based on the size and structure of the community, we believe the above described methods are the most effective means of meaningful engagement with the community. We believe these methods provide two-way communications so that the public is informed of the program's efforts and the Project Team is aware of the communities' needs and desires. We believe these methods will help connect residents affected by the brownfield sites to the opportunities that come from redevelopment.

#### *4. Site Eligibility and Property Ownership Eligibility*

Since this application is a community-wide proposal, this section is not applicable



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

December 2, 2014

Mr. Michael Overton  
County Administrator  
Jackson County  
120 West Michigan Avenue  
Jackson, Michigan 49201

Dear Mr. Overton:

SUBJECT: Acknowledgment Regarding the United States Environmental Protection Agency  
Brownfield Grant Proposal

Thank you for your notice and request for a letter of acknowledgment for Jackson County's proposal to the United States Environmental Protection Agency's (EPA) brownfield grant program. The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD), encourages and supports county-based redevelopment efforts. The information you have provided regarding your assessment grant proposal has been reviewed and determined to be of benefit to the citizens of Michigan.

Jackson County plans on applying for a \$200,000 hazardous substances assessment grant and a \$200,000 petroleum assessment grant, which could be used to conduct environmental investigation activities at eligible hazardous substances and petroleum brownfield sites in the county. Jackson County is considered eligible for this award as a local unit of government.

Should the EPA award the grant to Jackson County, it would support assessments at numerous brownfield sites, allowing redevelopment of underutilized and contaminated properties, and improving the economic development and environmental conditions throughout the county. If further assistance is needed please contact Mr. Ronald Smedley, Brownfield Redevelopment Coordinator, RRD, at 517-284-5153, or you may contact me.

Sincerely,

Carrie Geyer, Chief  
Brownfield Redevelopment Unit  
Remediation and Redevelopment Division  
517-284-5182

cc: Ms. Linda Mangrum, USEPA Region 5  
Mr. David Stegink, Envirologic  
Mr. Ronald Smedley, DEQ



# Community Action Agency

PROMOTING SELF-SUFFICIENCY

December 11, 2014

Ms. Amy L. Torres  
Executive Director  
Jackson County Brownfield Redevelopment Authority  
One Jackson Square  
Suite 1100  
Jackson, MI 49201

Re: Letter of Support regarding an Application for U.S. EPA Brownfield Assessment Grant Funds

Dear Ms. Torres:

This letter is to offer the support of Community Action Agency in the pursuit of a U.S. EPA Assessment Grant. Community Action Agency serves all of Jackson County providing a variety of education, housing, health and nutrition, community development, and economic self-sufficiency programs. As a Community Housing Development Organization qualified through the U.S. Housing and Urban Development (HUD) we help develop affordable housing for the community. In this capacity, we have benefited from the availability of the U.S. EPA Assessment Grant funds in the past. These funds have helped us in the due diligence of certain properties that we have acquired for development. The availability of these funds through Jackson County has helped us leverage federal HOME Investment Partnership Program (HOME) funds and other HUD funds. We have also partnered with Habitat for Humanity in the construction of affordable housing – transforming blighted, tax reverted properties into owner-occupied housing. We understand your grant proposal expresses a desire to assist us in a similar capacity with environmental assessments and hazardous material surveys to support our mission and help us leverage our other resources.

As an example of this collaboration, U.S. EPA Assessment grant funds aided in our development of the Partnership Park Neighborhood Revitalization project. This \$15 million project included construction of 16 new single family homes, rehabilitation of 44 existing units, demolition of 7 blighted structures, and construction of sidewalks, streetlighting, playground equipment and other amenities.

• Jackson  
1214 Greenwood  
Jackson, MI 49203  
(517) 784-4800  
(800) 491-0004  
Fax: (517) 784-5188  
www.caajlh.org

• Lenawee  
400 W. South St.  
Adrian, MI 49221  
(517) 263-7861  
(800) 438-1845  
Fax: (517) 263-6531  
www.caajlh.org

• Hillsdale  
55 Barnard Street  
Hillsdale, MI 49242  
(517) 437-3346  
(800) 750-9300  
Fax: (517) 437-3480  
www.caajlh.org

TDD: (800) 649-3777



We offer our support by assisting you in your efforts to communicate with neighborhoods where these projects will take place. Through our established partners and communication methods, we would have the capacity to inform and engage local neighborhoods about projects in the area, solicit feedback or help organize community meetings. For example, in the Partnership Park Neighborhood Revitalization project area we could aid in coordinating communications through both St John's United Church of Christ and the Partnership Park Downtown Neighborhood Association which can provide a means of communication to the neighborhood and the church offers a local meeting space.

The U.S. EPA Assessment Grant funds have been a valuable resource to Jackson County in the past - helping expand local industries and supporting new job creation, stabilizing neighborhoods, eliminating blight and uncontrolled environmentally contaminated sites. We offer our support and stress to U.S. EPA the value and importance these funds provide to our community.

We wish you luck with your application and look forward to continuing our work together.

Regards,

A handwritten signature in cursive script that reads "Toby L Berry". The signature is fluid and elegant, with a long, sweeping underline that extends to the right.

Toby L Berry  
Chief Executive Officer



The Enterprise Group  
of Jackson, Inc.

December 11, 2014

Ms. Amy L. Torres, Executive Director  
Jackson County Brownfield Redevelopment Authority  
One Jackson Square, Suite 1100  
Jackson, MI 49201

RE: U.S. EPA Brownfield Hazardous Substances and Petroleum Assessment Grant Proposal

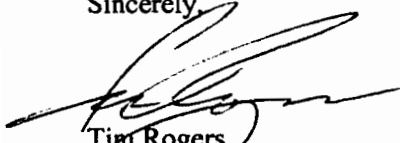
Dear Ms. Torres,

As one of our local partners, it is my pleasure to write a letter in support of Jackson County's application, for the current submission of the EPA Brownfield Hazardous Substances and Petroleum Assessment Grant.

The Enterprise Group of Jackson Inc. has worked collaboratively with the County as well as the Jackson County Brownfield Redevelopment Authority (JCBRA) to maintain and improve the quality and health of Jackson County for several years now. The County Brownfield program has been successful in assisting The Enterprise Group's economic development efforts by offering opportunities for growth, in an effort to create jobs, address environmental issues, and creating a safer place to live and work. Assistance has been given to area businesses in assessing contaminated property in order to expand their businesses and create new jobs as a result.

Obtaining these funds will assist in meeting the economic goals of the County. On behalf of the County, The Enterprise Group of Jackson, Inc. will assist the JCBRA as grant administrator, in marketing efforts for the Brownfield Authority and Brownfield properties, as well as in educating the business community about Brownfield incentives.

Sincerely,



Tim Rogers  
President and CEO





JACKSON COUNTY  
**Chamber of Commerce**



December 12, 2014

Amy Torres, Executive Director  
Jackson County Brownfield Redevelopment Authority  
One Jackson Square, Suite 1100  
Jackson, MI 49201

RE: U.S. EPA Hazardous Substance and Petroleum Assessment Grant Proposal

Dear Mrs. Torres:

The Jackson County Chamber of Commerce and Experience Jackson (Jackson County Visitors Bureau) are supporters of the County's efforts to tackle issues related to complicated brownfield sites. Since 2002, Jackson County has been fortunate enough to receive funding to make some of the higher-hanging projects come to fruition.

One of our primary goals is to create a strong local economy. Through collaborative partnerships with community and economic development organization, we work to attract and retain every job and every employer in Jackson County. The JCBRA is a vital element in our ability to do so. Redevelopment of Brownfields by businesses provides much needed jobs to the community.

Both the Chamber of Commerce and Experience Jackson provide direct lines of communication to the business. We strongly believe the County and its experience managing and through the JCBRA is a necessary tool for the economic success of redevelopment efforts in the community.

We are proud to be among the many entities involved in making that success a reality in the County of Jackson and will continue to work with the County and other community-based organizations in supporting Brownfield Redevelopment efforts to promote employment and economic development.

Sincerely,

Mindy-Bradish-Orta  
President/CEO, Jackson County Chamber of Commerce  
Executive Director, Jackson County Visitors Bureau



December 12, 2014

Amy Torres  
Executive Director  
Jackson County Brownfield Redevelopment Authority  
One Jackson Square, Suite 1100  
Jackson, Michigan 49201

Dear Ms Torres:

I am writing to express strong support from the Jackson Area Manufacturers Association (JAMA) for the Jackson County Brownfield Redevelopment Authority's pursuit of a USEPA Brownfield Assessment Grant. Funding from this grant will be instrumental in assisting Jackson area manufacturers in expansion and investment while simultaneously facilitating the remediation of contaminated properties.

JAMA strongly encourages existing area manufacturers and those interested in locating here to consider existing brownfield properties. We look forward to assisting the Jackson County BRA in their efforts to promote reuse of prior industrial sites.

Furthermore, we commit to directly work with those companies that opt to redevelop brownfield sites, providing them with worker training and recruitment support through JAMA's Academy for Manufacturing Careers, supply chain and logistics assistance, new customer identification and acquisition, and market diversification. We believe these to be important incentives in the decision-making process for manufacturers as they evaluate whether or not to opt for reuse of a brownfield site versus new "greenfield" construction. The most critical incentive in influencing a company's decision making, however, comes from the ability to leverage brownfield assessment funding.

Sincerely,

A handwritten signature in black ink that reads 'Bill Rayl'.

Bill Rayl  
Executive Director  
Jackson Area Manufacturers Association



**Baker College**  
2800 Springport Road  
Jackson, Michigan 49202  
Telephone (517) 789-6123  
Admissions (517) 788-7800  
Fax (517) 789-7331

December 14, 2014

Ms. Amy Torres  
Executive Director  
Jackson County Redevelopment Authority  
One Jackson Square  
Jackson, MI 49201

Dear Ms. Torres,

As the largest, private, non-profit career college in the State of Michigan, Baker College is committed to helping develop job opportunities for students and graduates. The College would be willing to host community events and forums to support the brownfield redevelopment efforts in our community at no cost. The College may also be able to assist by lending staff to review business plans and provide internship students for future projects. Thank you for your consideration of the proposal for the Jackson community. Please call me at 517-789-6123 if you have further questions.

Sincerely,

Dr. Patty Kaufman  
President, Baker College of Jackson



## JACKSON COLLEGE FOUNDATION

3000 Blake Road • Jackson, MI 49201 • 517.787.0244 • [www.jccmi.edu/foundation](http://www.jccmi.edu/foundation)

December 16, 2014

Amy Torres, Executive Director  
Jackson County Brownfield Redevelopment Authority  
One Jackson Square, Suite 1100  
Jackson, MI 49201

RE: U.S. EPA Hazardous Substance and Petroleum Assessment Grant Proposal

Dear Mrs. Torres:

On Behalf of Jackson College, I am pleased to submit this letter of support for the Jackson County (County) in their effort to obtain brownfield assessment grant funding. The County has a successful track record in assisting businesses, both new and existing, with their start-up and expansion needs. Having the availability of brownfield assessment dollars assists with the efforts to attract new businesses and retaining existing ones and offers prime development opportunities.

As an educational and economic force in Jackson, Jackson College can offer educational opportunities that can be utilized during Brownfield redevelopment, offer job training opportunities, commercial opportunities, access to jobs and help promote local entrepreneurial activities. Additionally, we feel that we can help keep the community engaged, involved and participating in redevelopment activities.

We are committed to promoting the welfare of our students and communities and will available for support during the duration of the upcoming assessment grant and beyond.

Sincerely,

Jason H. Valente, President  
Jackson College Foundation

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(800) 649-3777

**Hillsdale County**

21 Care Drive  
Hillsdale, MI 49242  
(517) 437-3381  
FAX (517) 437-4128

**Jackson County**

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Commerce Center  
209 E. Washington Ave.  
Suite 100  
Jackson, MI 49201  
(517) 841-5627  
FAX (517) 782-0140

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Lenawee County  
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1040 S. Winter Street  
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Adrian, MI 49221  
(517) 266-5627  
FAX (517) 266-2745

[www.scmw.org](http://www.scmw.org)

December 12, 2014

Ms. Amy Torres  
Jackson County Brownfield Redevelopment Authority  
One Jackson Square, Suite 1100  
Jackson, MI 49201

RE: EPA Brownfield Hazardous Substances and Petroleum Assessment Grant

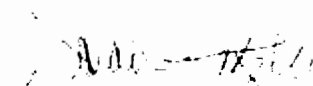
The South Central Michigan Works! (SCMW) Workforce Development Board's Business Services Team is a proud partner of the Jackson County Brownfield Redevelopment Authority (JCBRA). The JCBRA was one of the first in the state to form its Brownfield Redevelopment Authority in 1998 and has a long-standing relationship in promoting and supporting Brownfield Redevelopments in the business community.

Our Business Services Team collaborates with workforce, education and economic development partners to ensure that business is competitive, and to save and create jobs. The County BRA has a strong history of accessing State and federal funds to support Brownfield Redevelopment projects. Redevelopment of Brownfields by businesses provides much needed jobs in the community. Past history indicates that the projects typically create 10-20 jobs per project. If there were 2-3 projects per year this could translate into 100-300 new jobs created for over a five-year time frame. This is considered a very conservative estimate and is of vital importance to the local economy. SCMW currently funds many economic development initiatives in support of workforce development. We partner with The Enterprise Group, and others, to provide incentives for business to remain in the county and promote business attraction activities.

SCMW provides a direct line of communication to the business community and can promote redevelopment activities. We strongly believe this is a necessary tool for the economic success of redevelopment efforts in the County and that the JCBRA has demonstrated excellence in maintaining the well-established, long-term relationships necessary to continue managing and promoting Brownfield redevelopment in our community.

We are proud to be among the many entities involved in making that success a reality in Jackson and will continue to work with The Enterprise Group, the JCBRA and other community-based organizations in supporting Brownfield Redevelopment efforts to promote employment and economic development in Jackson County.

Respectfully,



Sarah Hartzler  
President





December 11, 2014

Ms. Linda Mangrum  
USEPA Region 5  
77 West Jackson Blvd., Mail Code SM-7J  
Chicago, IL 60604-3507

RE: RFP No. EPA-OSWER-OBLR-13-05  
U.S. EPA Brownfield Hazardous Substances and Petroleum Assessment Grant Proposal

Dear Ms. Mangrum,

In an effort to secure additional U.S. EPA Assessment Grant funds for Jackson County, The Jackson County Brownfield Redevelopment Authority (JCBRA) pledges funds that we have raised through Brownfield Plans, TIF capture, and Brownfield Revolving Loan Fund repayments to the redevelopment of brownfields in Jackson County. To date, the JCBRA has approximately \$86,560 in those various accounts to use as leverage for future brownfield projects to provide loans or contractual services to assess and/or cleanup sites, and provide services necessary to ensure the efficient functioning of the Brownfield Redevelopment Authority.

The JCBRA is staffed and served by The Enterprise Group of Jackson, Inc. through a contractual agreement. The Enterprise Group of Jackson, Inc. assists the JCBRA in marketing efforts for the Brownfield Authority and Brownfield properties, as well as educating the business community about Brownfield incentives through our EG Web site, social media sites, and our Retention Expansion Business Success Program.

The County Brownfield Program has been successful in assisting The Enterprise Group's economic development efforts by offering opportunities for growth, creating jobs, addressing environmental issues, and creating a safer place to live and work. Obtaining these funds will assist in meeting the economic goals of Jackson County.

Sincerely,

Amy L. Torres  
JCBRA Executive Director  
Staffed and Served by The Enterprise Group of Jackson, Inc.





**Jackson**

*Community Foundation*

**For Jackson. For good. For ever.**

December 17, 2014

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**email jcf@jacksoncf.org**  
**web www.jacksoncf.org**

Tim Rogers

The Jackson County Brownfield Redevelopment Authority  
The Enterprise Group of Jackson, Inc.  
100 E. Michigan Avenue, Suite 1100  
Jackson, MI 49201

RE: 2015 EPA Brownfield Assessment Grant Support

Dear Mr. Rogers,

The Jackson Community Foundation is pleased to support the Jackson County Brownfield Redevelopment Authority in applying for the 2015 EPA Brownfield Assessment Grant.

As you know, the Foundation is very interested in environmental quality and has proven our commitment by continuing to provide competitive grantmaking opportunities for environmental quality. We support opportunities that address the once thriving industrial areas in an effort to sustain economic development, address environmental issues, and to ensure that brownfields are cleaned up and reused. We see this happening in ways that contribute to healthier buildings and neighborhoods, that mitigate environmental conditions through remediation, that improve access by residents to greenspace, recreational property, transit, schools, healthy and affordable food, that improve employment and affordable housing and opportunities for local residents, and that reduce toxicity, illegal dumping, and blighted vacant properties.

Based on your mission and your involvement throughout Jackson County, we believe the Jackson Community Foundation would be able to aid the JCBRA in involving the affected community in assessment of cleanup decisions. We would also be a resource in communicating successes to the citizens of Jackson County as they happen. We are pleased to support actions that lead our community toward growth and stability.

If you have any questions about our support, please do not hesitate to call. In the meantime, I wish you every success and look forward to hearing more about the project when it is funded.

Sincerely,

Monica Moser